



# ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

International Specialists in the Environment

## MEMORANDUM

TO: Paul La Courreye, EPA

FROM: Chris Lichens, E & E, Inc.

DATE: November 30, 1988

SUBJECT: Completed Work

cc: Marcia Brooks, E & E, Inc.

This list is for the attached completed:

☐ PA(s)

☐ PA Review(s)

☐ PA Reassessment(s)

☐ SI(s)

☒ Other Reevaluation

*Elson -  
This is a PA-1 Completed  
date should be changed  
in census. Pml  
2.14.89*

Site Name

EPA I.D.#

City

FIT  
Recom-  
mendation

State  
Lead

Mercer Fraser Co.

CAD980382733

Fortuna

NFRAP

*BOTT FOR CONST  
CO DBA*

*EVT → PAI, N, F, DZ-28-89*

lb/lf/mercer/cwm

recycled paper



## ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

International Specialists in the Environment

### MEMORANDUM

**TO:** Paul La Courreye, EPA Region IX Site Screening Coordinator

**FROM:** Lorene Flaming, Ecology and Environment, Inc. *LCF*

**DATE:** November 30, 1988

**SUBJECT:** Reevaluation of the Preliminary Assessment of Mercer Fraser Co., dated July 1980

**TDD#:** F9-8809-060

**EPA ID#:** CAD980382733

**THROUGH:** Tom Carter, Ecology and Environment, Inc. *TC*

**COPY:** FIT Master File  
Chris Lichens, Ecology and Environment, Inc.  
Don Plain, California Department of Health Services,  
Sacramento

### INTRODUCTION

Under Technical Directive Document number F9-8709-019, Ecology and Environment, Inc.'s Field Investigation Team (FIT) has been tasked to reassess all Preliminary Assessments (PAs) in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) with "active" or "pending" status according to guidelines established to implement the Superfund Amendments and Reauthorization Act (SARA). During the course of this reassessment process, PAs were identified that contained insufficient information to allow an accurate reassessment. FIT has been subsequently directed to reevaluate and upgrade these PAs as needed to ensure that an accurate response determination is made.

The strategy for determination of further action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) is based solely on each site's potential to achieve a score high enough on the Hazard Ranking System (HRS) for inclusion on the National Priorities List (NPL). This strategy is intended to identify those sites posing the highest relative risk to human health or the environment. All other sites needing remedial or enforcement follow-up will be referred to the States or an appropriate Federal agency.

lb/lf/mercer/re-do

recycled paper

This site was evaluated primarily using the original HRS model. Additionally, this site was also evaluated for its potential to score using the draft revised HRS model. The following is a summary of FIT's findings with regard to this site.

#### SUMMARY

Since the 1950s Mercer Fraser (Mercer) has operated an aggregate processing facility and asphalt plant adjacent to the Eel River on Sandy Prairie Lane in Fortuna. Water is withdrawn from the Eel River and used in an aggregate cleaning process. The resulting wastewater contains sediment and is discharged to a large percolation pond on-site (800-feet by 100-feet by 5-feet). The clean aggregate is then mixed with oil in a rotating kiln to produce asphalt. Fred Bott of Eureka is the company owner (1).

In 1979 Mercer Fraser was identified by the EPA under the Surface Impoundment Assessment Program. According to the Regional Water Quality Control Board (RWQCB), Mercer discharges its washwater to a pond on-site in accordance with RWQCB Waste Discharge Requirements (Order No. 84-10) (2). Both RWQCB and the Humboldt County Health Department state that no hazardous waste is generated on-site (3, 4). The State Department of Health Services does not maintain a file on Mercer and Mercer is not listed in the RCRA database (5). The only incident recorded in agency files involved a small oil spill (less than 5 gallons) that occurred when the valve was left open on an oil storage tank (6).

The City of Fortuna has two wells within 3-miles of the site. Water from these wells is the sole source of drinking water for the residents of Fortuna and Rohnerville. The potential groundwater target population is 8,700. Depth to groundwater is approximately 25 feet and distance to the nearest well is 1.3 miles (7).

The Eel River is a designated Wild and Scenic River (8). According to RWQCB, the beneficial uses of this river include domestic and municipal water supply, recreation, wildlife habitat, and preservation of rare and endangered species (9). FIT was unable to obtain further information regarding the use of this river; however, the potential surface water target population appears small.

The potential air target population includes the residents of Fortuna (7,600), Fernbridge (20), Hydesville (1,000), and Rohnerville (1,000) (7, 11). No release to air has been documented to date.

It appears that Mercer Fraser does not pose a threat to human health or the environment because agency staff indicate that there is no hazardous waste generated on-site.

RECOMMENDATION

1) EPA

Based on preliminary HRS Screening, FIT recommends no further action under CERCLA for Mercer Fraser Company because there is no evidence to suggest that hazardous waste has been disposed on-site.

2) State or Other Agency

Copies of this reassessment will be sent to DOHS for its consideration.

EPA CONCURRENCE

Initial

Date

No Further Action Under CERCLA

pol

2.16.89

High-Priority SSI

\_\_\_\_\_

\_\_\_\_\_

Medium-Priority SSI

\_\_\_\_\_

\_\_\_\_\_

#### REFERENCES

- 1) FIT Conversation with William Bott of Mercer Fraser, 11/29/88.
- 2) RWQCB Executive Officers Summary Report, 1/19/84.
- 3) FIT Conversation with Bill Rodriguez of RWQCB, 11/16/88.
- 4) FIT Conversation with Bill Strickland of Humboldt County Health, 10/19/88.
- 5) FIT Conversation with Doris of DOHS, 11/4/88.
- 6) RWQCB Interoffice Communication from Norm Mantzsche to John Hannum, 6/10/75.
- 7) FIT Conversation with Bruce Gehrke of the City of Fortuna Utilities Department, 10/22/78.
- 8) FIT Conversation with Jack McMillian of the Department of Water Resources, 10/12/88.
- 9) RWQCB Waste Discharge Requirements (Order No. 84-10), 1984.
- 10) The Rand McNally Green Guide: U.S. Places With Over 100 People, based on 1980 Bureau of Census information.

# CONTACT REPORT

AGENCY/AFFILIATION: City of Fortuna		
DEPARTMENT : Utilities Dept.		
ADDRESS/CITY:		
COUNTY/STATE/ZIP:		
CONTACT(S)	TITLE	PHONE
1. Bruce Gehrke	Utilities Supv.	(707) 725-2665
2.		
E & E PERSON MAKING CONTACT: Lorene Fleming		DATE: 10/12/88
SUBJECT: Well locations		
SITE NAME: Fortuna Dump & Mercer-Fraser		EPA ID#:

The city services Fortuna and Rohnerville with 3000 hook-ups (8700 customers). They have 2 wells within 3 miles of these sites. One is located near Kenmore and 101 and has a static water level of 25'. (wells 1.3 miles SE of M.F. and 2.5 miles west of F.D.). The other well is located on Drake Hill Road and has a water level of approx. 60 ft. (wells located 2.25 miles SE of M.F. and 1.75 miles west of F.D.).

The Land Water Co. Services a few connections in the area of the Dump. (Bruce says their water is bad)  
 Lolita is serviced by ~~the county~~ domestic wells.  
 ↓ no listing.

## CONTACT REPORT

AGENCY/AFFILIATION: <i>mercer-fraser company</i>		
DEPARTMENT :		
ADDRESS/CITY: <i>Fortuna</i>		
COUNTY/STATE/ZIP: <i>Lumboldt</i>		
CONTACT(S)	TITLE	PHONE
1.		<i>(707) 725-2326</i>
2.		<i>(707) 443-6371</i>
E & E PERSON MAKING CONTACT: <i>Lorene Fleming</i>		DATE: <i>11/29/88</i>
SUBJECT: <i>Site history</i>		
SITE NAME: <i>mercer-fraser</i>		EPA ID#:

Operations began at this site in the 1950's. At one point they ceased and then began again in 1962.

Fred Bott is the owner and president, William Bott is the secretary.

Operations include both an asphalt plant and aggregate processing facility. Water is removed from Eel River and sent through a system to remove sediment from gravel. It is then disposed in 2 pond on-site.

# CONTACT REPORT

AGENCY/AFFILIATION: RWQCB		
DEPARTMENT :		
ADDRESS/CITY: Santa Rosa		
COUNTY/STATE/ZIP:		
CONTACT(S)	TITLE	PHONE
1. Bill Rodriguez		(707) 576-2220
2.		
E & E PERSON MAKING CONTACT: Lorene Fleming		DATE: 11/16/88
SUBJECT: Waste streams		
SITE NAME: Mercer - Fraser		EPA ID#:

The only waste generated on-site is muddy water from gravel wash operations. Water is percolated through soil in ponds on-site - not hazardous but a permit is required because muddy water can't be discharged directly to river.

Asphalt process consists of a rotating-inclined kiln which contains gravel. Gravel is heated up and then sprayed with oil inside the tank. No oil is released to ground except in the normal construction of asphalt roads.

site is regulated for air pollution because of dust problem.

No hazardous waste on-site.



# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Dept. of Water Resources		
<b>DEPARTMENT :</b>		
<b>ADDRESS/CITY:</b>		
<b>COUNTY/STATE/ZIP:</b>		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Jack McMullan		(916) 527-6530
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Lorene Fleming		<b>DATE:</b> 10/12/88
<b>SUBJECT:</b> Well locations and surface water		
<b>SITE NAME:</b> Fortuna area sites MF		<b>EPA ID#:</b>

Groundwater in area is used for irrigation and drinking. Distance from sites to nearest wells can not really be determined from their files. No agency in this county really keeps accurate well data except for one called the Humboldt Community Services District for the Eureka vicinity.

Eel River and Van Duzen are part of the Wild & Scenic Rivers Act and are protected under federal legislation. No surface water is used for irrigation in this area.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> North Coast Unified Air Quality District		
<b>DEPARTMENT :</b>		
<b>ADDRESS/CITY:</b>		
<b>COUNTY/STATE/ZIP:</b>		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Bob Clark		(707) 443-3093
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Lorene Flaming		<b>DATE:</b> 10/17/88
<b>SUBJECT:</b> Humboldt Co. permits		
<b>SITE NAME:</b> Inercer - Fraser		<b>EPA ID#:</b>

site has a permit from this agency but it does not involve any hazardous waste.

# CONTACT REPORT

AGENCY/AFFILIATION: Humboldt County Health		
DEPARTMENT :		
ADDRESS/CITY:		
COUNTY/STATE/ZIP: Humboldt, CA		
CONTACT(S)	TITLE	PHONE
1. Bill Strickland		(707) 445-6215
2.		
E & E PERSON MAKING CONTACT: Lorene C. Fleming		DATE: 10/19/88
SUBJECT: site history		
SITE NAME: Mercer-Fraser, Fortuna		EPA ID#:

The impoundment on-site is used as a gravel settling pond. This company mines gravel and uses it for road construction. No report of hazardous waste disposal on-site.

# CONTACT REPORT

AGENCY/AFFILIATION: DDMS		
DEPARTMENT : TOXICS		
ADDRESS/CITY: Emeryville		
COUNTY/STATE/ZIP:		
CONTACT(S)	TITLE	PHONE
1. Doris		(415) 540 - 2998
2.		
E & E PERSON MAKING CONTACT: Lorene Flaming		DATE: 11/4/88
SUBJECT: Humboldt County Sites		
SITE NAME: Mercer - Fraser, Fortuna		EPA ID#:

NO file in their office on this site

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
North Coast Region

Interoffice Communication

MEMORANDUM

TO: John Hannum *JH*  
Bill Rodriguez *BR*  
File

DATE: May 7, 1976

FROM: Manuel Baldenegro

SUBJECT: Mercer Fraser Company and Albert Pedrazzini Sandy Prairie Plant -  
Humboldt County

On April 28, 1976 I conducted a walk through inspection of the Mercer Fraser aggregate plant in company of Mr. Jerry Brazil plant supervisor.

The site is located upstream from the point of confluence of Strongs Creek and the Eel River and west of Highway 101 and South 12th Street in Fortuna.

The operation consists of a hot asphalt plant and a rock crushing and gravel washing plant. Three-quarter inch base rock was being processed from river-run material stockpiled on site from last year. The hot plant was processing asphalt. Approximately 60-70 tons of river-run aggregate stockpiled on site from last year. The gravel bar is not being worked at this time. A percolation pond adjacent to Strongs Creek provides containment for wastewater and measures approximately 800 feet long, 100' wide with 4 ft. to 6 ft. of freeboard.

A pump with a discharge capacity of 450 gals./min. is used to provide water from Strongs Creek and the Eel River.

Oil and fuel storage tanks on site are stored under ground. Three oil storage tanks have capacities of 12,000 gals., 10,000 gals. and 8,000 gals. One diesel tank has a capacity of 10,000 gallons.

All wastewater from the hot asphalt plant was being retained in the percolation pond. The operation is in compliance with Waste Discharge Requirements. Attached is the NPDES Compliance Monitoring Checklist for a "B" level inspection on Mercer Fraser Company and Albert Pedrazzini Sandy Prairie Plant.

*MGB*  
Manuel G. Baldenegro  
Sanitary Engineering Technician

MGB:jf

## NPDES COMPLIANCE INSPECTION REPORT (Coding Instructions on back of last page)

TRANSACTION CODE	NPDES	YR	MO	DA	TYPE	INSP. TOR	FAC TYPE	TIME
1	5	2	6	0	23388	7	9	1330
1	2	3	11	12	17	18	19	20

## REMARKS

21 64

## ADDITIONAL

65 70

## SECTION A - Permit Summary

NAME AND ADDRESS OF FACILITY (Include County, State and ZIP code)		EXPIRATION DATE
MEELEK FEASER COMPANY 12th Street West FORTUNA, CA.		84-01-25
RESPONSIBLE OFFICIAL E.O. BOTT		ISSUANCE DATE 74-02-27
FACILITY REPRESENTATIVE JERRY BRAZIL		PHONE (707) 443-6371
TITLE PRESIDENT		PHONE (707) 725-2326
TITLE PLANT FOREMAN		

## SECTION B - Effluent Characteristics (Additional sheets attached \_\_\_\_\_)

PARAMETER/OUTFALL	MINIMUM	AVERAGE	MAXIMUM	ADDITIONAL
SAMPLE MEASUREMENT				
PERMIT REQUIREMENT				
SAMPLE MEASUREMENT				
PERMIT REQUIREMENT				
SAMPLE MEASUREMENT				
PERMIT REQUIREMENT				
SAMPLE MEASUREMENT				
PERMIT REQUIREMENT				
SAMPLE MEASUREMENT				
PERMIT REQUIREMENT				

## SECTION C - Facility Evaluation (S = Satisfactory, U = Unsatisfactory, N/A = Not applicable)

S	EFFLUENT WITHIN PERMIT REQUIREMENTS	S	OPERATION AND MAINTENANCE	N/A	SAMPLING PROCEDURES
N/A	RECORDS AND REPORTS	N/A	COMPLIANCE SCHEDULE	N/A	LABORATORY PRACTICES
S	PERMIT VERIFICATION	N/A	FLOW MEASUREMENTS		OTHER:

SECTION D - Comments *All wastewater contained in Resulation Pond adjacent to EEL River*

SIGNATURES			AGENCY	DATE	ENFORCEMENT DIVISION USE ONLY
INSPECTED BY Manuel A. Balderas			LEWOLB-702	79-07-30	COMPLIANCE STATUS
INSPECTED BY					<input type="checkbox"/> COMPLIANCE
REVIEWED BY					<input type="checkbox"/> NONCOMPLIANCE

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO.

CA 0023388

## SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY  
(Including City, County and ZIP code)P.O. Box 1006  
Eureka, Ca 95501

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE

76-04-28 (State)

FINDINGS

Compliance with Waste Discharge  
Requirements -

## SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

☐ YES☐ NO☒ N/A (Further explanation attached \_\_\_\_\_)

## DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:

(i) SAMPLING DATE, TIME, EXACT LOCATION

☐ YES☐ NO☒ N/A

(ii) ANALYSES DATES, TIMES

☐ YES☐ NO☒ N/A

(iii) INDIVIDUAL PERFORMING ANALYSIS

☐ YES☐ NO☒ N/A

(iv) ANALYTICAL METHODS/TECHNIQUES USED

☐ YES☐ NO☒ N/A

(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)

☐ YES☐ NO☒ N/A

(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation, calibration and maintenance records).

☐ YES☐ NO☒ N/A

(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.

☐ YES☐ NO☒ N/A

(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.

☐ YES☐ NO☒ N/A

(e) QUALITY ASSURANCE RECORDS KEPT.

☐ YES☐ NO☒ N/A

(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.

☐ YES☐ NO☒ N/A

## SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT.

☒ YES☐ NO☐ N/A (Further explanation attached \_\_\_\_\_)

DETAILS: Wastewater contained in Pond

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.

☒ YES☐ NO☐ N/A

(b) FACILITY IS AS DESCRIBED IN PERMIT.

☒ YES☐ NO☐ N/A

(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.

☒ YES☐ NO☐ N/A

(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.

☒ YES☐ NO☐ N/A

(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.

☐ YES☐ NO☒ N/A

(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.

☐ YES☐ NO☒ N/A

(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.

☒ YES☐ NO☐ N/A

(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.

☒ YES☐ NO☐ N/A

(i) ALL DISCHARGES ARE PERMITTED.

☐ YES☒ NO☐ N/A

## SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

☒ YES☐ NO☐ N/A (Further explanation attached \_\_\_\_\_)

## DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.

☐ YES☐ NO☒ N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

☐ YES☐ NO☒ N/A

(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.

☐ YES☐ NO☒ N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.

☐ YES☐ NO☒ N/A

(e) ALL TREATMENT UNITS IN SERVICE.

☐ YES☐ NO☒ N/A

(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.

☐ YES☐ NO☒ N/A

(g) QUALIFIED OPERATING STAFF PROVIDED.

☒ YES☐ NO☐ N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.

☐ YES☐ NO☒ N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.

☐ YES☐ NO☒ N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.

☐ YES☐ NO☒ N/A

(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.

☐ YES☐ NO☒ N/A

(l) SPCC PLAN AVAILABLE.

☐ YES☐ NO☒ N/A

(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates \_\_\_\_\_)

☐ YES☐ NO☒ N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION.

☐ YES☐ NO☒ N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.

☐ YES☐ NO☒ N/A

PERMIT NO.

CA0023388

## SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE.

☐ YES ☐ NO ☒ N/A (Further explanation attached \_\_\_\_\_)

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

## SECTION K - Self-Monitoring Program

## Part 1 - Flow measurement (Further explanation attached \_\_\_\_\_)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.  
DETAILS:☐ YES ☐ NO ☒ N/A

(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.

☐ YES ☐ NO ☒ N/ATYPE OF DEVICE: ☐ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER (Specify \_\_\_\_\_)

(b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration \_\_\_\_\_)

☐ YES ☐ NO ☒ N/A

(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.

☐ YES ☐ NO ☒ N/A

(d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED.

☐ YES ☐ NO ☒ N/A

(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.

☐ YES ☐ NO ☒ N/A

## Part 2 - Sampling (Further explanation attached \_\_\_\_\_)

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.  
DETAILS:☒ YES ☐ NO ☐ N/A

(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.

☐ YES ☐ NO ☒ N/A

(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.

☒ YES ☐ NO ☐ N/A(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.  
IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY☐ YES ☐ NO ☒ N/A

(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.

☒ YES ☐ NO ☐ N/A

(i) SAMPLES REFRIGERATED DURING COMPOSITING

☒ YES ☐ NO ☐ N/A

(ii) PROPER PRESERVATION TECHNIQUES USED

☐ YES ☐ NO ☒ N/A

(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT

☐ YES ☐ NO ☒ N/A

(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3

☐ YES ☐ NO ☒ N/A

(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.

☐ YES ☐ NO ☒ N/A

(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.

☐ YES ☐ NO ☒ N/A

## Part 3 - Laboratory (Further explanation attached \_\_\_\_\_)

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.  
DETAILS:☐ YES ☐ NO ☒ N/A

(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3)

☐ YES ☐ NO ☒ N/A

(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.

☐ YES ☐ NO ☒ N/A

(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.

☐ YES ☐ NO ☒ N/A

(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.

☐ YES ☐ NO ☒ N/A

(e) QUALITY CONTROL PROCEDURES USED.

☐ YES ☐ NO ☒ N/A

(f) DUPLICATE SAMPLES ARE ANALYZED. \_\_\_\_\_ % OF TIME.

☐ YES ☐ NO ☐ N/A

(g) SPIKED SAMPLES ARE USED. \_\_\_\_\_ % OF TIME.

☐ YES ☐ NO ☒ N/A

(h) COMMERCIAL LABORATORY USED.

☐ YES ☐ NO ☒ N/A

(i) COMMERCIAL LABORATORY STATE CERTIFIED.

☐ YES ☐ NO ☒ N/A

LAB NAME \_\_\_\_\_

LAB ADDRESS \_\_\_\_\_



	PERMIT NO. <b>CA 0123388</b>
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**SECTION L - Effluent/Receiving Water Observations** (Further explanation attached \_\_\_\_\_)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
<i>no discharge to surface waters</i>							

(Sections M and N: Complete as appropriate for sampling inspections)

**SECTION M - Sampling Inspection Procedures and Observations** (Further explanation attached \_\_\_\_\_)

- ☐ GRAB SAMPLES OBTAINED
- ☐ COMPOSITE OBTAINED
- ☐ FLOW PROPORTIONED SAMPLE
- ☐ AUTOMATIC SAMPLER USED
- ☐ SAMPLE SPLIT WITH PERMITTEE
- ☐ CHAIN OF CUSTODY EMPLOYED
- ☐ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY \_\_\_\_\_ PRESERVATION \_\_\_\_\_

SAMPLE REFRIGERATED DURING COMPOSITING: ☐ YES ☐ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE \_\_\_\_\_

**SECTION N - Analytical Results** (Attach report if necessary)

June 10, 1975

Mercer-Fraser Company  
P.O. Box 1006  
Eureka, California 95501

Gentlemen:

On June 5, 1975 while conducting an inspection of the lower reaches of Strongs Creek, Warden Robert Taylor of the Department of Fish and Game and I noted a discharge of highly turbid water from the Mercer-Fraser hot plant operation located on the south bank of the stream.

The discharge carried a heavy sediment load and turned the entirety of Strongs Creek brown and turbid downstream to its confluence with the Eel River. The effect of the discharge on the Eel River was also noticeable as a plume of sediment extended into the river near the mouth of Strongs Creek.

Warden Taylor and I located and spoke with Mr. Jerry Brazil who was supervising the hot plant operation at the time. He informed us that the discharge to Strongs Creek consisted of gravel wash water from the hot plant operation. We explained the problem with the discharge and advised him to correct the situation immediately. Mr. Brazil was quite cooperative in seeing to it that a temporary impoundment was constructed to prevent the further escape of wash water into the creek.

Also, while inspecting the source of the discharge with Mr. Brazil, we noted the presence of a large oil tank within the area through which wash water drainage was flowing. The outlet of the tank's drain pipe was submerged in the wash water and the valve was found in the "open" position. Although there was no evidence of a sizeable discharge of oil from the tank, we are, nevertheless, concerned about the situation. You should be aware that State law provides for severe penalties in cases involving the intentional or negligent discharge of oil to surface waters.

We appreciate the quick action taken to abate the pollution problem. We feel, however, that there is no excuse for a recurrence of this situation and advise you that formal enforcement action will be taken if this problem should arise again. We suggest, therefore, that you be certain that the containment area for gravel wash water or other wastes is adequate for your anticipated operations.

Mercer-Fraser Company

Page Two

June 10, 1975

Should you have any questions concerning this matter, please don't hesitate to contact this office.

Sincerely,

Norman N. Hantzsch  
Assistant Engineer, Specialist

cc: Department of Fish & Game  
Eureka, Calif. 95501

NNH:jf

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
North Coast Region

Interoffice Communication

MEMORANDUM

TO: John Hannum *JH*  
File

DATE: June 10, 1975

FROM: Norm Hantzsche

SUBJECT: Mercer-Fraser Hot Plant Discharge to Strongs Creek

On June 5, 1975, at approximately 1200 hours, Warden Bob Taylor (DFG - Eureka) and myself, while inspecting Strongs Creek below the Fortuna Veneer discharge, happened upon a direct discharge of gravel wash water from the Mercer-Fraser Hot Plant operation to Strongs Creek.

The discharge carried a very heavy sediment load, turning Strongs Creek brown and turbid downstream to its confluence with the Eel River. A sediment plume was also noticeable in the waters of the Eel River near the mouth of Strongs Creek. The affected reach of Strongs Creek showed evidence of siltation in the streambed. Also, the temperature of the discharge was found to be 84°F and caused the temperature of Strongs Creek to rise from 61°F to 63°F.

After taking several photos and water samples, Taylor and I located and spoke with the hot plant foreman on duty, Jerry Brazil. We showed him what was happening and advised him to correct the situation immediately. He was cooperative and immediately brought in a loader to construct a pond to hold the wash water which was escaping.

We also noted a large oil tank (several thousand gallon capacity) situated within the area where wash water was draining toward the creek. The outlet of the drain pipe on the tank was submerged in the wash water and the valve was found in the open position. There were some small patches of oil in the water around the tank, but no significant quantities. I pointed out the problem with the oil tank to the foreman and tried to get some information on tank and open valve, etc. However, he mumbled something indiscrete and took off to find the loader.

I've prepared a letter to the Mercer-Fraser Company to warn them of the situation and possible future enforcement action if this happens again.

NNH:bb

*Norm Hantzsche*

*11mm out slides in plastic sack*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
North Coast Region

Interoffice Communication

MEMORANDUM

TO: William Rodriguez

DATE: September 16, 1974

FROM: Doug McMillan

SUBJECT: Mercer Fraser Company and Pedrazzini Sandy Prairie Plant (adjacent to Eel River)

On August 28, 1974 at approximately 1130 hours I inspected the premises of Mercer Fraser Company and Pedrazzini Sandy Prairie Plant located adjacent to the Eel River. At the time of inspection no washwater or cooling water for the hot batch plant was being produced. I followed the pathway of previous wastewater from the hot batch plant. This wastewater spread out in a vegetated area of approximately 100 to 150 square feet. This ponding area has no protective dikes and only a heavily vegetated area separates Strong Creek from the washwater. There was no evidence of past or present discharge of wastewater from the hot batch plant into Strong Creek or the Eel River.

Doug McMillan  
Graduate Student Assistant

*Doug McMillan*